



# Knuckles Komosinski & Manfro LLP

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February 1, 2017

## VIA ECF

Residential Capital, LLC  
1100 Virginia Dr.  
Ft. Washington, Pennsylvania, 19034  
Attn: Melody Wright

Morrison & Foerster LLP  
1290 Avenue of the Americas  
New York, New York 10104  
Attn: Norman S. Rosenbaum  
James Newton, and  
Erica J. Richards

Office of the United States Trustee  
33 Whitehall Street, 21st Floor  
New York, New York 10004  
Attn: Brian Masumoto, Esq. and  
Michael Driscoll, Esq.

Kramer Levin, Naftalis & Frankel LLP  
Counsel for the Committee  
1177 Avenue of the Americas  
New York, New York 10036  
Attn: Elise Frejka and Douglas Mannal

## VIA FIRST CLASS MAIL

Jerry D. Cotton  
Lisa J. Cotton  
15423 Roscommon Lane  
Granger, Indiana, 46530

Pro Se

**In Re: Residential Capital, LLC**  
**Bankruptcy Court Case No.: 12-12020-mg**  
**Property: 15423 Roscommon Lane, Granger, Indiana, 46530**

To Whom It May Concern:

This office represents the interest of The Bank of New York Mellon FKA The Bank of New York, as Trustee for the Certificate Holders of the CWABS Inc. Asset Backed Certificate S, Series 2005-BC5, first lien holder and Plaintiff in the above reference matters.

THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE  
TO THE EXTENT YOUR OBLIGATION HAS BEEN DISCHARGED OR IS SUBJECT TO AN AUTOMATIC STAY OF BANKRUPTCY ORDER UNDER  
TITLE 11 OF THE UNITED STATES CODE, THIS NOTICE IS FOR COMPLIANCE AND INFORMATIONAL PURPOSES ONLY AND DOES NOT  
CONSTITUTE A DEMAND FOR PAYMENT OR AN ATTEMPT TO COLLECT ANY SUCH OBLIGATION. RATHER, IT IS A STEP IN THE  
ENFORCEMENT OF A MORTGAGE LIEN AGAINST YOUR PROPERTY.



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Please accept this letter as a formal Written Request to lift the stay as it pertains to 15423 Roscommon Lane, Granger, Indiana, 46530, the subject property.

Enclosed please find the following:

- Senior Lien Stay Relief Questionnaire ("Questionnaire")
- Exhibit A – Title Search
- Exhibit B – Broker Price Opinion (BPO)
- Exhibit C – Total Amount Due Calculation
  - This figure cannot be relied upon as a "Payoff" quotation.

As you can see from the Questionnaire and Exhibits, there is no equity in the property. Thus, this office formally requests that a Stipulation and Order Pursuant to 11 U.S.C. § 362(d) Modifying the Automatic Stay Imposed by 11 U.S.C. § 362(a).

If you have any questions, please do not hesitate to contact this office.

Sincerely,

Knuckles, Komosinski & Manfro, LLP  
Attorneys for The Bank of New York  
Mellon FKA The Bank of New York, as  
Trustee for the Certificate Holders of the  
CWABS Inc. Asset Backed Certificate S,  
Series 2005-BC5

By:   
Nicole M. Massi, ESQ.